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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

February 6, 2008

Ms. Shirley J. Olinger, Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

RECEIVED
FEB 11 2008
EDMC

Mr. William S. Elkins, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: H4-02
Richland, Washington 99354

Re: Submittal of Hanford Facility RCRA Permit Modification Notification Form
24590-LAW-PCN-ENV-07-014; Class 1 Modification to the Hanford Facility Resource
Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion, for the
Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit 10
(Waste Treatment and Immobilization Plant), WA7890008967

Dear Ms. Olinger and Mr. Elkins:

The Department of Ecology approves the referenced Class 1 Modification submitted
January 23, 2008. The approved Hanford Facility RCRA Permit Modification Notification Form
is enclosed.

Modification 24590-LAW-PCN-ENV-07-014 provides the updated process flow diagram
(24590-LAW-M5-V17T-P0014, Revision 2) for the Liquid Effluent (System RLD).
This replaces the current permit process flow diagram in Appendix 9.1.

During the transition period from permit drawings to engineering source drawings, the parties
agree you may show in phantom, items not requiring an installation inspection or inclusion in the
Independent Qualified Registered Professional Engineer Report. Ecology is approving the
design changes identified in the Permittees' submittal. Decisions on the regulation of items
shown in phantom will be made later. At the end of the transition period, permit submittals will
contain engineering source documents and will be incorporated into the permit as described in
Ecology Publication # 07-05-006 (www.ecy.wa.gov/biblio/nwp.html).

Ms. Olinger and Mr. Elkins
February 6, 2008
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One note of clarification: the fifth bullet on the Hanford Facility RCRA Permit Modification Notification Form reads "Updated reference 1 and corrected note 9." This change refers to modifications made on the source document. This bullet is not applicable to the approved document, 24590-LAW-M5-V17T-P0014, Revision 2.

If there are any questions, contact me at 509-372-7882 or Tracy Gao at 509-372-7901.

Sincerely,



Brenda Becker-Khaleel
WTP Permit Writer
Nuclear Waste Program

aah/jc
Enclosure

cc electronic w/enc:

Dave Bartus, EPA
John Eschenberg, USDOE
Lori Huffman, USDOE
Tony McKarns, USDOE
Gae Neath, USDOE
Don Sommer, USDOE
William Taylor, USDOE
Julie Colby, BNI
Brad Erlandson, BNI
Peggy Fisher, BNI
Stan Hill, BNI
Dennis Klein, BNI
Sandi Murdock, BNI
Suzette Thompson, FHI
Phil Peistrup, WGI

cc w/enc:

Administrative Record: Tank Waste Treatment Requirements✓
Environmental Portal
Hanford Operating Record General File
USDOE-ORP Correspondence Control

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Hanford Facility RCRA Permit Modification Notification Form**Part III, Operating Unit 10****Waste Treatment and Immobilization Plant**

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Page 2 of 2: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant
Update LAW Vitrification Building - Process Flow Diagram (PFD) for the LAW Liquid Effluent (System RLD) -
24590-LAW-M5-V17T-P0014 in Appendix 9.1 of the Dangerous Waste Permit.

Submitted by Co-Operator:

D. A. Klein
D. A. Klein

12/26/07
Date

Reviewed by ORP Program Office:

S. J. Olinger
S. J. Olinger

1/22/08
Date

Quarter Ending March 31, 2008

24590-LAW-PCN-ENV-07-014

Hanford Facility RCRA Permit Modification Notification Form													
Unit: Waste Treatment and Immobilization Plant		Permit Part & Chapter: Part III, Operating Unit 10											
Description of Modification: The purpose of this Class 1 modification is to update the Process Flow Diagram (PFD) for the Liquid Effluent (System RLD) - 24590-LAW-M5-V17T-P0014. The following permit PFD is submitted to replace the one currently in Appendix 9.1.													
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="4" style="padding: 2px;">Appendix 9.1</td> </tr> <tr> <td style="width: 15%; padding: 2px;">Replace:</td> <td style="width: 35%; padding: 2px;">24590-LAW-M5-V17T-P0014, Rev. 1</td> <td style="width: 15%; padding: 2px;">With:</td> <td style="width: 35%; padding: 2px;">24590-LAW-M5-V17T-P0014, Rev. 2</td> </tr> </table>				Appendix 9.1				Replace:	24590-LAW-M5-V17T-P0014, Rev. 1	With:	24590-LAW-M5-V17T-P0014, Rev. 2		
Appendix 9.1													
Replace:	24590-LAW-M5-V17T-P0014, Rev. 1	With:	24590-LAW-M5-V17T-P0014, Rev. 2										
The referenced PFD is a complete revision. It incorporates changes provided in applicable document change forms (e.g., DCN, SCN, SDDR, FCN, FCR, etc.) and changes associated with the resolution to comments on change documents since the issuance of the last revision of the permitted drawing. This modification requests Ecology approval and incorporation into the permit. Revisions are the result of ongoing design changes. The following identifies the significant types of changes on the attached drawing.													
<u>24590-LAW-M5-V17T-P0014</u> <ul style="list-style-type: none"> • Updated notes and references • Removed reference to NLD-VSL-00005 and associated pumps (NLD-PMP-00003A/B) from drawing • Separated effluent streams so they don't combine before entering vessel (from generic waste stream references to separation of individual waste streams flowing to each vessel) • Added third eductor in RLD-VSL-00004 • Updated reference 1 and corrected note 9 • Corrected manual valve symbol to on/off actuated valve symbol (coordinate F-5) • Relabeled LVP-TNK-00001 drain system to RLD-VSL-00003 (clarification of from caustic collection tank berm to LVP-TNK-00001 containment drain) • Added pump numbers to drawing for RLD-VSL-00003 (RLD-PMP-00001A/B) and RLD-VSL-00005 (RLD-PMP-00003A/B) • Incorporated DCN 24590-LAW-M5N-V17T-00022, to update waste stream designators going into and out of RLD vessels 00003, 00004, and 00005. 													
The following is a list of outstanding change documents that have not been incorporated into this modification: None													
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 45%; padding: 2px;">WAC 173-303-830 Modification Class: ^{1 2}</td> <td style="width: 10%; padding: 2px;">Class 1</td> <td style="width: 10%; padding: 2px;">Class ¹1</td> <td style="width: 10%; padding: 2px;">Class 2</td> <td style="width: 15%; padding: 2px;">Class 3</td> </tr> <tr> <td style="padding: 2px;">Please mark the Modification Class:</td> <td style="text-align: center; padding: 2px;">X</td> <td></td> <td></td> <td></td> </tr> </table>				WAC 173-303-830 Modification Class: ^{1 2}	Class 1	Class ¹ 1	Class 2	Class 3	Please mark the Modification Class:	X			
WAC 173-303-830 Modification Class: ^{1 2}	Class 1	Class ¹ 1	Class 2	Class 3									
Please mark the Modification Class:	X												
Enter Relevant WAC 173-303-830, Appendix I Modification citation number: A.1 & A.3 Enter wording of WAC 173-303-830, Appendix I Modification citation: Appendix 1 A. General Permit Provisions. 1. Administrative and informational changes. 3. Equipment replacement or upgrading with functionally equivalent components (e.g., pipes, valves, pumps, conveyors, controls).													

¹ Class 1 modifications requiring prior Agency approval.

² If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class '1, if applicable.

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WAC 173-303-830(4)(d)(ii)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment. In the case of Class 1 modifications, the director may require prior approval."

Modification Approved: ☒ Yes ☐ No (state reason for denial)Reason for denial:

Reviewed by Ecology:



B. Becker-Khaleel

2/6/08

Date